

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

ROY COCKRUM, ET AL.,

*Plaintiffs,*

v.

DONALD J. TRUMP FOR PRESIDENT, INC.,

*Defendant.*

Case No. 3:18-cv-484-HEH

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**DEFENDANT DONALD J. TRUMP FOR PRESIDENT, INC.'S  
MOTION TO DISMISS THE AMENDED COMPLAINT**

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*Counsel for Donald J. Trump for President, Inc.*

In accordance with Federal Rule of Civil Procedure 12(b)(6), Defendant Donald J. Trump for President, Inc. respectfully moves that the Court dismiss all claims with prejudice for failure to state a claim upon which relief can be granted.

Dated: October 8, 2018

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Respectfully submitted,

/s/ Nikki L. McArthur

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**CERTIFICATE OF SERVICE**

I certify that on October 8, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered parties.

Dated: October 8, 2018

/s/ Nikki L. McArthur

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Nikki L. McArthur

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